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June 6, 2022

VIA ECF

The Honorable Valerie Figueredo
United States District Court for the
Southern District of New York
Daniel Patrick Moynihan Courthouse
500 Pearl Street, Courtroom 17A
New York, NY 10007

Application Granted

A handwritten signature in black ink, appearing to read "Valerie Figueredo", is written over a horizontal line.

Valerie Figueredo, U.S.M.J.

DATED: 6-7-2022

The discovery conference scheduled for Thursday, June 16, 2022 is hereby adjourned to Monday, June 27 at 11 a.m. Defendant's reply in support of its motion for leave to amend its answer to the complaint is due by Friday, June 17, 2022.

Re: *DBW Investments, LLC, et al. v. VNUE, Inc.*, Case No. 21-cv-8103 (VSB)

Dear Judge Figueredo:

We are counsel for Defendant VNUE, Inc. in the above-referenced action. We write to request that the Court (i) adjourn the discovery conference currently set for June 16, 2022 and (ii) enlarge the time for Defendant to file its reply in support of its motion for leave to amend its answer to the complaint (the "Motion") pursuant to Federal Rule of Civil Procedure 6(b)(1).

First, Defendant requests that the Court adjourn the discovery conference to June 22, 2022 because undersigned counsel will be unavailable on June 16; counsel is currently scheduled to attend depositions out of state (in Arizona) on that date. Undersigned counsel is lead attorney for this matter with primary responsibility for attending all hearings and conferences. Although counsel's firm is able to assign a different attorney, he or she would not be as familiar with the record as undersigned counsel.

Second, as for Defendant's deadline to file its reply in support of the Motion, Defendant requests the Court enlarge its deadline from June 10 to June 17, 2022 to file its reply to Plaintiffs' opposition to the Motion. The current is the same date that the Court has scheduled Plaintiffs' deadline to file their opposition to the Motion (June 10, 2022). *See* ECF 30.

We thank the Court for its attention to this matter.

Respectfully,

/s/ Gustave Passanante

Gustave P. Passanante, Esq.